

April 1, 2008

Mr. Dan Mahar
EPA Region 10
1200 Sixth Ave, Suite 900, AWT-107
Seattle, WA 98101

**RE: Proposed Issuance of Air Quality Control Minor Permit No. R10OCS-AK-07-01
(Revised) to Shell Offshore, Inc.**

Dear Mr. Mahar:

Thank you for this opportunity to comment on the Environmental Protection Agency's (EPA) proposal to issue Shell Offshore, Inc. ("Shell") a minor source permit authorizing it to deploy and operate the *Kulluk* drill rig and its supporting vessels at sites in the Beaufort Sea. Oceana is very concerned about the contributions to climate change and other detrimental health and environmental impacts that Shell's proposed activities and the issuance of this permit will have in the Arctic. In the face of dramatic and poorly understood changes in the Arctic, EPA should be looking very carefully at all proposed emissions, should abide by the letter of the law, and should not attempt to bend the language of the Clean Air Act to allow Shell to carry out proposed drilling in the Beaufort Sea. Nothing Shell proposes is minor.

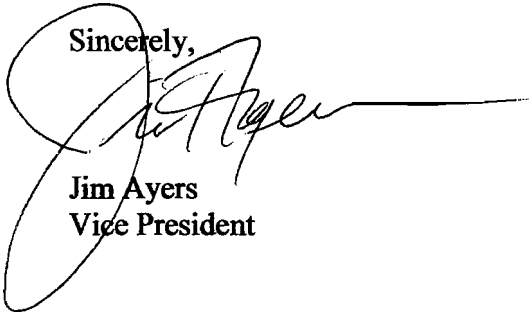
Shell seeks, and EPA proposes to grant, approval for activities that would result in the emission of hundreds of tons of pollutants into the Arctic atmosphere. These pollutants include nitrogen oxides (NO_x), sulfur oxides (SO_x), and fine particulate matter (PM₁₀). These compounds can have substantial environmental and health effects.

The impacts and evidence of climate change have been well documented. Pollution from greenhouse gases is warming our planet and acidifying our oceans at an unprecedented rate and causing direct and indirect effects on our marine ecosystems. These changes are occurring more quickly and dramatically in the Arctic, where EPA proposes to allow Shell to operate. The impacts of climate change on the Arctic have stunned the scientific community and many people who have lived in the Arctic their entire lives. Both NO_x and PM₁₀ contribute to this growing problem. NO_x is a greenhouse gas that, like CO₂, traps sunlight and causes the planet to warm. Emissions of particulate matter, especially black carbon, are of substantial concern in the Arctic. In the atmosphere, black carbon absorbs solar radiation, which contributes to warming. The deposition of black carbon darkens snow and ice surfaces, which reduces albedo, or reflectivity, which increasing melting, particularly of Arctic sea ice.

Moreover, each of the pollutants Shell proposes to emit can have significant health effects. The people who live in the Arctic and depend on it for their survival will bear these effects disproportionately.

In light of these substantial and growing impacts from emissions like those proposed by Shell, EPA must be vigilant in upholding the existing legal requirements. We generally agree with the substance of comments submitted by the Northern Alaska Environmental Center and others on the legal issues presented by EPA's proposed issuance of this permit. EPA must take seriously its responsibility to ensure compliance with the Clean Air Act, and should not approve this Shell application for a minor source permit.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Ayers', with a long horizontal line extending to the right. The signature is written over the printed name and title.

Jim Ayers
Vice President